

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:)

Sellers v. Ameridose, et al.,)
Case No. 1:13-cv-12620)

Temple v. Ameridose, et al.,)
Case No. 1:13-cv-12696)

**JOINT MOTION FOR ENTRY OF
CONSENT DISMISSAL ORDER**

The Plaintiffs' Steering Committee, Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; and Debra Schamberg, RN, (collectively "STOPNC Defendants"), and Defendants Saint Thomas West Hospital, formerly known as St. Thomas Hospital; Saint Thomas Network; Saint Thomas Health; Ascension Health, and Ascension Health Alliance, (collectively "Saint Thomas Defendants"), (collectively with the STOPNC Defendants, the "Nashville Health Care Defendants"), jointly request that the Court enter an order dismissing with prejudice all of the cases listed in the Consent Dismissal Order attached hereto as Exhibit 1 ("the Nashville Actions").

Pursuant to the terms of the parties' Settlement Agreement, the Plaintiffs must dismiss all claims against the Nashville Health Care Defendants once they receive full and final payment from the Saint Thomas Escrow Settlement Fund. The Plaintiffs in the listed Nashville Actions recently received that final payment. Accordingly, the parties

respectfully request that the Court enter the Consent Dismissal Order attached hereto as Exhibit 1.¹ This fully and finally resolves all claims against all Defendants in the cases listed in the Consent Dismissal Order.

Respectfully submitted,

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¹ The Consent Dismissal Order follows the same basic procedure used to dismiss the Insight cases following the settlement in those cases. See Doc. 2083.

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 4th day of April, 2018.

/s/ Chris J. Tardio

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